U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

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UNITED STATES OF AMERICA)	
)	NO. 3:15-00093
V.)	18 U.S.C. § 2251
)	18 U.S.C. § 2252A(a)(1)
JARRATT A. TURNER)	18 U.S.C. § 2253
)	

INDICTMENT

COUNTS ONE TO SIXTEEN

THE GRAND JURY CHARGES:

On or about the dates set forth below, in the Middle District of Tennessee and elsewhere, the defendant, **JARRATT A. TURNER**, did employ, use, persuade, induce, entice, and coerce a minor child under the age of twelve as specified below to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce:

Count	Date	Victim
1	October 4, 2014	Victim A, a male child under the age of 12
2	October 5, 2014	Victim A, a male child under the age of 12
3	October 11, 2014	Victim B, a female child under the age of 12
4	October 31, 2014	Victim A, a male child under the age of 12
5	November 14, 2014	Victim B, a female child under the age of 12
6	December 6, 2014	Victim A, a male child under the age of 12

Count	Date	Victim
7	December 7, 2014	Victim A, a male child under the age of 12
8	December 20, 2014	Victim B, a female child under the age of 12
9	February 28, 2015	Victim A, a male child under the age of 12
10	March 21, 2015	Victim B, a female child under the age of 12
11	April 13, 2015	Victim B, a female child under the age of 12
12	April 19, 2015	Victim B, a female child under the age of 12
13	April 20, 2015	Victim B, a female child under the age of 12
14	May 18, 2015	Victim B, a female child under the age of 12
15	May 21, 2015	Victim B, a female child under the age of 12
16	May 23, 2015	Victim B, a female child under the age of 12

In violation of Title 18, United States Code, Sections 2251(a) and 2251(d).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES:

Between on or about April 14, 2015, and on or about May 25, 2015, in the Middle District of Tennessee and elsewhere, the defendant, **JARRATT A. TURNER**, knowingly transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252A(a)(1) and 2252A(b).

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER CHARGES:

The allegations contained this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

Upon conviction of one or more of the offenses alleged in Counts ONE through SEVENTEEN of this Indictment, **JARRATT A. TURNER**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

- (1) any visual depiction described in 18 U.S.C. §§ 2251 or 2252A, of this chapter or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s), or a money judgment representing such gross profits or other proceeds; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property.

Including, but not limited to, electronic devices seized from the person of **JARRATT A. TURNER** or from his residence at 3804 Oxford Street, Nashville, Tennessee, on or about June 5, 2015, including, but not limited to, the following:

Samsung Galaxy S6 (Phone); Model – SM-G920P; MEID - 256691544701127425

Samsung Galaxy S3 (Phone); Model – SGH-T999; IMEI 355164055511369

Next Tablet; Model – NX785QC8G; S/N YFG0714147835

Samsung Galaxy Tab3 (Tablet); Model – SM-T217S; MEID – 256691514203605879

ASUS Tablet; Model – ME173X; S/N D70KCY023371

SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- i. Cannot be located upon the exercise of due diligence;
- ii. Has been transferred or sold to, or deposited with, a third person;
- iii. Has been placed beyond the jurisdiction of the Court;
- iv. Has been substantially diminished in value; or
- v. Has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property, and it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated in Title 28, United States Code, Section 2461(c)), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including a money judgment in an amount to be determined, which represents the proceeds of the crime.

All pursuant to Title 21, United States Code, Section 853 and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

FOREPERSON

DAVID RIVERA

UNITED STATES ATTORNEY

S. CARRAN DAUGHTREY

ASSISTANT UNITED STATES ATTORNEY